

1 SO. CAL. EQUAL ACCESS GROUP
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5 Attorneys for Plaintiff
6 EDMOND NEAL

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9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 EDMOND NEAL,
12 Plaintiff,

13 vs.

14 HOLLYWOOD BOOKS, LLC;
15 MELROSE EQUITIES, LLC; and DOES 1
16 to 10,

17 Defendants.

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19 **Case No.: 2:25-cv-00239-PVC**

20 **Plaintiff's Notice of Motion and Motion
21 for Default Judgment by Court**

22 Date: May 20, 2025

23 Time: 10:00 a.m.

24 Courtroom: 590, 5th Floor

25 Honorable Judge Pedro V. Castillo

26 To Defendant MELROSE EQUITIES, LLC and the attorneys of record, if any:
27 Please take notice that on May 20, 2025, at 10:00 a.m., or as soon thereafter as this matter
28 may be heard by this Court located at 255 East Temple Street, Los Angeles, California,
Plaintiff EDMOND NEAL will present Plaintiff's motion for default judgment against
Defendant MELROSE EQUITIES, LLC. The Clerk has previously entered the default on
said Defendant on March 7, 2025 (Dkt. #11) and March 19, 2025 (Dkt. #17).

At the time and place of hearing, Plaintiff will present proof of the following
matters: (1) Defendant MELROSE EQUITIES, LLC is not a minor or incompetent
person or in military service or otherwise exempted under the Soldier and Sailor's Civil

1 Relief Act of 1940; (2) Defendant MELROSE EQUITIES, LLC has not appeared in this
2 action; and (3) Plaintiff is entitled to judgment against said Defendant on account of the
3 claims pleaded in the complaint, to wit: a violation of the Americans with Disabilities
4 Act, the Unruh Civil Rights Act, the California Disabled Persons Act, the California's
5 Unfair Competition Act, and Negligence.

6 The Plaintiff seeks a judgment in the amount of \$4,000.00 in statutory damages,
7 \$2,725.00 in attorney's fees, and \$715.00 in costs as set forth in the attached Declaration
8 of Jason J. Kim and an Order directing the Defendant to: make alterations in such a
9 manner that, to the maximum extent feasible, the goods, services, facilities, privileges,
10 advantages, or accommodations offered by Defendant are readily accessible to and usable
11 by individuals with disabilities at the property located at or about 6917 Melrose Ave., Los
12 Angeles, California. This motion is based on this notice, the declarations submitted in
13 support of this motion, and other matters which may be presented at the hearing.

14 Notice of the original motion for default judgment by court was served on
15 Defendant MELROSE EQUITIES, LLC on April 16, 2025, by first class United States
16 Mail, postage prepaid.

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18 Dated: April 16, 2025

SO. CAL. EQUAL ACCESS GROUP

21 By: /s/ Jason J. Kim
22 Jason J. Kim, Esq.
23 Attorneys for Plaintiff
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